

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA – NORTHERN DIVISION

DREW J. RIBAR, Plaintiff, Pro Se,
v.
WASHOE COUNTY, NEVADA, et al., Defendants.

Case No. **3:24-cv-00526-ART-CSD**

PLAINTIFF’S NOTICE OF SERVICE OF RULE 11 SAFE-HARBOR

NOTICES

Plaintiff **Drew J. Ribar** hereby gives notice to the Court, pursuant to **Fed. R. Civ. P. 5(d)** and **Rule 11(c)(2)**, that on **October 6, 2025**, he served **Rule 11 Safe-Harbor Notices** upon counsel for the following defendants:

1. **Alison Gansert Kertis, Esq.**, counsel for *Build Our Center, Inc.*, via email and CM/ECF, regarding **ECF Nos. 130** and **145** (*Motion for Temporary Restraining Order and Reply*).
2. **Lindsay L. Liddell, Esq.**, counsel for *Washoe County Defendants*, via email and CM/ECF, regarding **ECF No. 140** (*Joinder to Motion for TRO*).

Copies of the Safe-Harbor Notices are attached hereto as **Exhibits A-2** and **A-3**, respectively.

Each notice complies with **Fed. R. Civ. P. 11(c)(2)** by specifically identifying the challenged filings, describing the factual and legal bases for sanctions, and providing twenty-one (21) days from service for withdrawal or correction before any motion for sanctions is filed.

1 Dated: October 6, 2025

2 Respectfully submitted,
3
4

5
6 **/s/ Drew J. Ribar**

7 DREW J. RIBAR

8 Plaintiff, Pro Se

9 3480 Pershing Lane

10 Washoe Valley, NV 89704

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12 (775) 223-7899 | const2audit@gmail.com
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA – NORTHERN DIVISION

DREW J. RIBAR, Plaintiff, Pro Se,
v.
WASHOE COUNTY, NEVADA, et al., Defendants.

Case No. **3:24-cv-00526-ART-CSD**

EXHIBIT A-2

**RULE 11 SAFE-HARBOR NOTICE TO ATTORNEY ALISON GANSERT KERTIS,
ESQ.**

(Served October 6, 2025)

Description:

Plaintiff's formal Safe-Harbor Notice letter served pursuant to **Fed. R. Civ. P. 11(c)(2)** upon **Attorney Alison Gansert Kertis**, counsel for **Defendant Build Our Center, Inc.**, regarding the false and frivolous filings identified as **ECF Nos. 130** (*Motion for Temporary Restraining Order*) and **145** (*Reply in Support of TRO*).

This exhibit demonstrates Plaintiff's full compliance with the twenty-one (21) day notice requirement under **Rule 11(c)(2)** prior to filing a motion for sanctions.

Attached Document:

Letter from Plaintiff Drew J. Ribar to Attorney Kertis, dated October 6, 2025, served via CM/ECF and email (akertis@sierracrestlaw.com).

Filed in Support of:

Plaintiff's Notice of Service of Rule 11 Safe-Harbor Notices
and forthcoming Motion for Sanctions under Fed. R. Civ. P. 11.

/s/ Drew J. Ribar

DREW J. RIBAR, Plaintiff Pro Se

3480 Pershing Lane

Washoe Valley, NV 89704

(775) 223-7899 | const2audit@gmail.com

1 **Date:** October 6, 2025

2 **Via Email and CM/ECF**

3 Alison Gansert Kertis, Esq.

4 Sierra Crest Business Law Group

5 6770 South McCarran Boulevard, First Floor

6 Reno, NV 89509

7 Email: akertis@sierracrestlaw.com

8
9
10 **Re:** Rule 11 Safe-Harbor Notice – Ribar v. Washoe County et al., Case No. 3:24-cv-00526-

11 ART-CSD

12
13 Dear Ms. Kertis:

14
15 Pursuant to **Federal Rule of Civil Procedure 11(c)(2)**, this letter serves as formal **Safe-Harbor**
16 **Notice** of my intent to move for sanctions against you and your client, **Build Our Center, Inc.**,
17 for the filing of materially false and frivolous pleadings in this case.

18
19 **1. Challenged Filings**

20
21 This notice specifically concerns the following documents you filed:

- 22
- 23 • **ECF No. 130** – *Defendant Build Our Center, Inc. 's Motion for Temporary Restraining*
 - 24 *Order* (Sept 18, 2025);
 - 25 • **ECF No. 145** – *Defendant Build Our Center, Inc. 's Reply in Support of TRO* (Sept 30,
 - 26 *2025*).
 - 27

1 **2. Basis of Violation**

2
3 Both filings contain factual misrepresentations that violate **Rule 11(b)(1)** and **(b)(3)**:

- 4
- 5 1. They falsely assert that Plaintiff “harassed,” “followed,” or “approached” Build Our
6 Center’s staff at specified times and locations—statements disproven by GPS records and
7 sworn declarations already on file (see ECF 141 and supporting exhibits).
 - 8 2. These falsehoods appear intended to harass, defame, and chill Plaintiff’s protected speech
9 and political activity, constituting an **improper purpose** under Rule 11(b)(1).
 - 10 3. The filings lack any reasonable evidentiary basis, violating **Rule 11(b)(3)**.
- 11

12 **3. Required Action**

13
14 Pursuant to Rule 11(c)(2), you and your client have **21 days from service of this notice** to
15 **withdraw ECF 130 and ECF 145** or file corrected papers retracting the false statements.

16
17 If those documents are not withdrawn or corrected within 21 days, I will file a **Motion for**
18 **Sanctions** seeking:

- 19
- 20 • Monetary sanctions sufficient to deter repetition;
 - 21 • Referral of your conduct to the State Bar of Nevada under LR IA 11-7(a); and
 - 22 • Striking of the offending filings from the record.
- 23

24
25 Please govern yourself accordingly.

26
27 Respectfully,

28 **Drew J. Ribar**

1 Plaintiff, Pro Se

2 3480 Pershing Lane

3 Washoe Valley, NV 89704

4 (775) 223-7899 | const2audit@gmail.com

28 PLEADING TITLE - 7

UNITED STATES DISTRICT COURT

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DREW J. RIBAR, Plaintiff, Pro Se,
v.
WASHOE COUNTY, NEVADA, et al., Defendants.

Case No. **3:24-cv-00526-ART-CSD**

EXHIBIT A-3

RULE 11 SAFE-HARBOR NOTICE TO ATTORNEY LINDSAY L. LIDDELL, ESQ.

(Served October 6, 2025)

Description:

Plaintiff's formal Safe-Harbor Notice letter served pursuant to **Fed. R. Civ. P. 11(c)(2)** upon **Attorney Lindsay L. Liddell**, counsel for **Washoe County Defendants**, regarding ECF No. **140** (*Joinder to Build Our Center's Motion for Temporary Restraining Order*).

This exhibit evidences Plaintiff's compliance with the twenty-one (21) day notice requirement before seeking Rule 11 sanctions for filing and joining false or unsupported allegations.

Attached Document:

Letter from Plaintiff Drew J. Ribar to Attorney Liddell, dated October 6, 2025, served via CM/ECF and email (lliddell@da.washoecounty.gov).

Filed in Support of:

Plaintiff's Notice of Service of Rule 11 Safe-Harbor Notices
and forthcoming Motion for Sanctions under Fed. R. Civ. P. 11.

/s/ Drew J. Ribar

DREW J. RIBAR, Plaintiff Pro Se

3480 Pershing Lane

Washoe Valley, NV 89704

(775) 223-7899 | const2audit@gmail.com

1 **Date:** October 6, 2025

2 **Via Email and CM/ECF**

3 Lindsay L. Liddell, Esq.

4 Washoe County District Attorney's Office

5 1 South Sierra Street

6 Reno, NV 89501

7 Email: lliddell@da.washoecounty.gov

8
9
10 **Re:** Rule 11 Safe-Harbor Notice – Ribar v. Washoe County et al., Case No. 3:24-cv-00526-

11 ART-CSD

12
13 Dear Ms. Liddell:

14
15 This letter constitutes a **Safe-Harbor Notice under Fed. R. Civ. P. 11(c)(2)** regarding the filing
16 of **ECF No. 140** – *County Defendants' Joinder to Build Our Center's Motion for TRO* (Sept 23,
17 2025).

18
19 **1. Nature of Violation**

20
21 By joining ECF 130, the County Defendants adopted the same false factual allegations that Build
22 Our Center asserted, including claims that Plaintiff “harassed” or “followed” library staff—
23 allegations contradicted by verified GPS records and prior court filings (ECF 141).

24
25 Filing or endorsing materially false statements for the purpose of discrediting or silencing a
26 litigant violates:

- 1 • **Rule 11(b)(1)** – improper purpose (harassment and chilling of First Amendment
- 2 activity); and
- 3 • **Rule 11(b)(3)** – lack of evidentiary support.
- 4

5 **2. Required Action**

6

7 You have **21 days from service of this notice** to **withdraw ECF 140** or file a corrected notice

8 clarifying that the County Defendants do not endorse the false allegations contained in ECF 130.

9

10 Failure to do so will result in a Rule 11 motion against you and your clients seeking:

11

- 12 • Sanctions sufficient to deter repetition;
- 13 • Referral of your conduct to the State Bar of Nevada under LR IA 11-7(a); and
- 14 • An order striking ECF 140 from the record.
- 15

16 Please treat this notice as formal service under FRCP 5(b)(2)(E) and Rule 11(c)(2).

17

18 Respectfully,

19 **Drew J. Ribar**

20 Plaintiff, Pro Se

21 3480 Pershing Lane

22 Washoe Valley, NV 89704

23 (775) 223-7899 | const2audit@gmail.com

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CERTIFICATE OF SERVICE

I hereby certify that on **October 6, 2025**, I served the foregoing **Notice of Service of Rule 11 Safe-Harbor Notices** and attached exhibits on all counsel of record via the Court's **CM/ECF** system, which automatically notifies registered participants, and by direct email to:

- **Alison Gansert Kertis**, Esq. – akertis@sierracrestlaw.com
- **Lindsay L. Liddell**, Esq. – lliddell@da.washoecounty.gov

/s/ **Drew J. Ribar**

Drew J. Ribar, Plaintiff Pro Se